

EXHIBIT G

**DEPOSITION TRANSCRIPT
THERESA HOFFMAN**

(Relevant Pages Only)

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD C. SMITH,
PLAINTIFF

VS

NO. 1:08-CV-0366

PRIME CARE MEDICAL, INC.,
CARL A. HOFFMAN, JR., D.O.,
THERESA M. HOFFMAN,
JOSHUA D. LOCK, MARCY
HOFFMAN-SCHLEGEL, FRANK
KOMYKOSKI, AND KNIGHTS
OF VON DUKE, LTD.,
DEFENDANTS



DEPOSITION OF: THERESA M. HOFFMAN

TAKEN BY: PLAINTIFF

BEFORE: DONNA J. FOX, REPORTER
NOTARY PUBLIC

DATE: MAY 30, 2009, 8:30 A.M.

PLACE: CLARK & KREVSKY
20 ERFORD ROAD
CAMP HILL, PENNSYLVANIA

1 Q What was the first thing that was said?

2 A I have no idea. "Hello." I don't know.

3 Q You don't remember?

4 A No. It was January 28th.

5 Q Do you remember who said what?

6 A No, I don't really remember how it
7 started out.

8 Q What occurred?

9 A I'm not sure who spoke first. But
10 basically what occurred was we just told Rick what I
11 just told you: Here's the hours of the office, the
12 hours of operation; the time clock needed to be used;
13 the lunchroom issue, and whatever else the discussion
14 was. I really don't remember all of it.

15 Q How long did the discussion last?

16 A About an hour maybe, hour and a half.
17 Rick took notes during it. So I don't really remember
18 myself.

19 Q Who did most of the talking?

20 A Josh and Rick.

21 Q Did you take notes?

22 A No.

23 Q Did Josh take notes?

24 A I honestly don't remember.

25 Q What was it that Josh said to Rick?

1 remember generally?

2 A I don't remember generally.

3 Q In the course of this meeting, did Rick
4 provide you and/or Josh with a letter?

5 A At the very end of the meeting, as the
6 meeting was ended, I believe he may have had a
7 portfolio, as he has now, something like that. He
8 opened it up and handed out a few letters to both of
9 us, I believe one with Marcy Hoffman-Schlegel, one
10 with Carl Hoffman, one with myself and one with Josh's
11 name on it. And we walked out of the meeting and that
12 was that.

13 Q What was it that he handed you?

14 A He handed us an envelope with names on
15 them, a sealed envelope with names on them.

16 Q He handed you four envelopes?

17 A Not specifically me. I think I was only
18 given mine and Carl's, and I think Josh was given his
19 and Marcy's. I'm not positive.

20 Q What did you do with the envelopes that
21 he handed you?

22 A I don't recall if my husband was there at
23 the time. But I went out and opened mine, and I
24 believe Marcy's was given to her. I may have had
25 Marcy's, also. I don't recall.

1 STATE OF PENNSYLVANIA : §

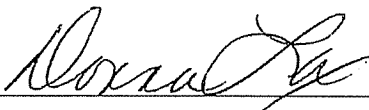
2 COUNTY OF DAUPHIN :

3
4 I, Donna J. Fox, a Reporter-Notary Public,
5 authorized to administer oaths within and for the
6 Commonwealth of Pennsylvania and take depositions in the
7 trial of causes, do hereby certify that the foregoing is the
8 testimony of Theresa M. Hoffman.

9 I further certify that before the taking of
10 said deposition, the witness was duly sworn; that the
11 questions and answers were taken down stenographically by the
12 said reporter Donna J. Fox, a Reporter Notary-Public,
13 approved and agreed to, and afterwards reduced to typewriting
14 under the direction of the said Reporter.

15 I further certify that the proceedings and
16 evidence contained fully and accurately in the notes by me on
17 the within deposition, and that this copy is a correct
18 transcript of the same.

19 In testimony whereof, I have hereunto,
20 subscribed my hand this 12th day of June, 2009.

21
22 

23 Donna J. Fox, Reporter

24 My commission expires:

25 April 7, 2012